

Before The
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Request for Relief from Phase II)	CC Docket No. 94-102
E911 Requirements)	

REQUEST FOR RELIEF

1. PetroCom License Corporation (“PetroCom”) is a small business wireless cellular radiotelephone licensee providing service to customers in the Gulf of Mexico. PetroCom’s cellular system employs analog equipment. Unlike land-based cellular systems, cellular operations in the Gulf must necessarily cover a small population over a very large expanse of territory. PetroCom’s cellular system covers an area in excess of 86,000 square miles. Further, in serving the coastline of the Gulf, PetroCom must deal with the jurisdictions of several states and numerous counties and cities. For the reasons stated herein, PetroCom respectfully requests relief from the E911 Phase II implementation rules contained in Section 20.18(e), (f) and (h) of the FCC’s rules.

2. Currently, PetroCom routes no-charge 911 calls from its coverage area in the Gulf to the Coast Guard United States Search and Rescue Operations in New Orleans, which screens the calls and acts as a public safety answering point (“PSAP”). Although evidence may indicate that many wireless customers on land use a cellular phone for safety and security reasons, this is not the case with PetroCom’s wireless customers. The majority of PetroCom’s customers operate from fixed locations on oil platforms. Unlike the typical land based wireless customer, a wireless customer on an oil platform has, and will use, other emergency and safety systems on which to rely, including company microwave systems, private radio systems, UHF/VHF and single side band systems. In addition, all oil production and service companies have emergency operating procedures and survival training.

3. With respect to boats operating in the Gulf of Mexico, The Coast Guard deploys a sophisticated Search and Rescue (“SAR”) program. The primary distress communications method of the SAR program in the Gulf is the VHF-FM Distress Net standard. The Coast Guard also makes extensive use of the 406 MHz Emergency Position Indicating Radio Beacon (“EPIRB”) to alert it to distress situations and locate the position of the boat. EPIRB is mandatory for some categories of commercial boats and is recommended for all boats operating offshore. The Coast Guard considers cellular telephones to be a secondary means of contacting them in the event of an emergency.¹

4. In its report describing its Phase II plans, PetroCom outlined its plan to deploy a network-based E911 solution. A network solution was selected, rather than a handset one, based on expected

¹ See description of SAR program at the Coast Guard website, www.uscg.mil.

costs and availability. To date, PetroCom has not received a request from the Coast Guard, acting as the Gulf of Mexico PSAP, for either Phase I or Phase II E911 services.

5. PetroCom is engaging in discussions with its equipment supplier, Motorola, regarding developing a plan to deploy E911 service in the Gulf of Mexico. PetroCom understands that because it operates in essentially a rural environment, with a low cell site density, it will be harder and more time consuming to satisfy the accuracy requirements of Section 20.18(h).

6. PetroCom also intends to explore the feasibility of deploying in the Gulf other E911 solutions such as those offered by Telecommunications Systems.

7. Based on PetroCom's understanding of the availability of E911 solutions, it expects to implement an E911 solution within 12-24 months from the date of this filing. Given that the Gulf of Mexico PSAP has not yet made a request for E911 services, and more importantly, given the extensive SAR program currently deployed by the Coast Guard, PetroCom believes that this timetable is both realistic and appropriate.²

8. For the reasons described above, PetroCom respectfully requests a 24 month waiver of the E911 Phase II implementation rules contained in Section 20.18(e), (f) and (h). To help the FCC monitor PetroCom's progress in coming to compliance with these rules, PetroCom proposes submitting a progress report to the FCC every six months.

Respectfully submitted,

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² PetroCom notes that a Coast Guard Report, Boating Statistics - 2000 ("Report") (at page 26) reveals that there was not been a boating accident fatality during either 1999 or 2000 within nine miles offshore in the Gulf. Further, during 2000, there were no accidents in the same area involving significant injury or property damage (Report at page 29).

